

**LAW OFFICE OF VICTOR M. FERARU**

**1225 FRANKLIN AVENUE  
SUITE 325  
GARDEN CITY, NEW YORK 11530  
WWW.VICSLAW.COM**

**(516) 415-2114  
FAX: (516) 494-7239  
VICTOR@VICSLAW.COM**

October 2, 2023

ADMITTED TO THE NEW YORK BAR

Via ECF  
Magistrate Judge Katharine H. Parker  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

*In re: Kuan v. Notoriety Group LLC et al  
Letter Motion Seeking Leave to Have  
In camera review of Document*

Dear Hon. Court:

This office represents Defendants in the above-entitled action. The purpose of this letter motion is to request leave to submit to the Court *in camera* and under seal a letter from my treating cardiologist. The letter has highly confidential medical information.

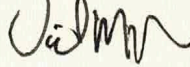
Although I am now fully able to represent my clients, the Plaintiff takes the incredible approach of somehow twisting my explanation that I was (1) confronted with medical issues suddenly and over a prolonged period, (2) that I had significant technology issues concerning receiving notices from ECF bounces, as having a lack of candor towards that Court. It is embarrassing that opposing counsel seeks to attack the attorney.

My office was still operational, it was my federal cases, for some time, that unfortunately were affected. To attack an attorney based upon disabilities is incredible, but apparently not below my opposing counsel. I understand that my adversary would like this case to be decided on a technical default and is working tirelessly to those ends, but to impugn a practitioner, a sole practitioner for having health issues, technology issues, and unfortunately moving and embarrassingly allowing a case to slip through the proverbial cracks is beyond the pale. The moving papers did not say I was incapacitated. Plaintiff wishing to besmirch the attorney for his client's pecuniary gain is his choice; however, I would like to provide this Court with the necessary documentation to buttress my claim.

Plaintiff has gone to great efforts, including publishing a press release concerning this pending case as against my clients from the onset of the case in efforts to persuade my client to settle this matter. It is fixated on having this case resolved on technical factors. Defendants in this case have viable, meritorious defenses, to attack an attorney who had disabilities for a period of time, and technological issues, among other temporary items is incredible.

That said, the letter from my treating physician, which is confidential, and contains extremely confidential medical issues for the portion prong of my moving papers. More importantly, Defendants have meritorious defenses. It is respectfully requested that I be able to provide the above-mentioned letter, for the Court's consideration, *in camera*, as to the prong of the moving papers that speaks to my past health conditions. The remainder of the contentions can be dispensed of during the Oct. 2, 2023, call.

Very Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Victor M. Feraru', written in a cursive style.

Victor M. Feraru

Note: The office number has changed, it is now 516-699-2285.

Cc: All interested parties via ECF